**REMARKS** 

The method claims have been amended to express the particular kind of PICM being

sensed in order to distinguish from the pyroelectric response measured in the Clarke et al.

reference. The method claims now require that the photo-induced charge movements consist of

isometric change or the ejection of electrons, protons or OH ions, thereby precluding sensing of

pyroelectric effects. Because of this limitation, the methodology of Clarke et al. does not

anticipate or make obvious the method claims as presented.

In the apparatus claims, the language has been amended to better express that the dye is

adsorbed on the membrane itself. As previously argued, all prior arguments being incorporated

by reference herein, Clarke et al. has a dye adhered to the electrode itself. Because of this

limitation, the apparatus of Clarke et al. does not anticipate nor make obvious the apparatus as

presented, as the apparatus of Clarke et al. would not function if the dye was adhered to the

membrane and therefore there is no motivation or suggestion in Clarke et al. to alter the

apparatus in such manner.

It is respectfully submitted that the claims as amended are patentable, on the basis of the

above remarks, and reconsideration and subsequent passage for allowance is hereby requested.

Respectfully submitted,

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